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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:17-cr-00400-HZ**

**v.**

**MOTION FOR LEAVE TO FILE  
MATTER UNDER SEAL**

**JASON PAUL SCHAEFER,**

**Defendant.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and through Assistant United States Attorney Benjamin Tolkoff, hereby moves the Court for leave to submit a motion under seal.

The government has learned that there has been a violation of a discovery protective order in this matter and must submit the matter for the Court's review. The submission will

necessarily identify matters protected by orders of this Court and therefore cannot be published in the open record of this case.

Dated: February 16, 2019

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

*/s/ Ben Tolkoff*

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BENJAMIN TOLKOFF, NYSB #4294443  
Assistant United States Attorney